

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

JUANA CARO

DEBTOR

BANCO POPULAR DE PUERTO RICO

MOVANT

Vs.

JUANA CARO  
WILBERTO LUGO MENDER

AS DEBTOR / TRUSTEE

CASE NO. 16-04482/BKT

CHAPTER 7

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DEBTOR'S RESPONSE TO MOTION FOR RELIEF FROM  
STAY FILED BY BANCO POPULAR DE PUERTO RICO, DOCKET #37

TO THE HONORABLE COURT:

**NOW COMES, JUANA CARO**, through the undersigned attorney, and very respectfully states and prays as follow:

1. Banco Popular de Puerto Rico ("BPPR") filed a Motion for Relief from Stay, docket #37, basically alleging that debtor is in arrears in her direct post-petition mortgage payments with said creditor.

2. The debtor met with the undersigned attorney regarding this matter and respectfully submits that she did incur in post-petition mortgage arrears due to certain economic problems.

3. The debtor hereby respectfully submits that she is in the process of meeting with BPPR to qualify for a mortgage loan modification. Furthermore, the debtor filed a